

John D. Nation
SBN 14819700
Andrea L. Nation
SBN 14819400
4925 Greenville Avenue, Suite 200
Dallas, Texas 75206
214-800-5160
214-800-5161 (facsimile)

Russell Wilson II
State Bar No. 00794870
1910 Pacific Avenue, Suite 15100
Dallas, Texas 75201
469-573-0211
972-704-2907 (fax)

Counsel for Debtor Freewood Group, LLC

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE:	§	Chapter 7
	§	
FREWOOD GROUP, LLC	§	No. 17-30589-SGJ-7
	§	
DEBTOR	§	

**MOTION FOR STAY AND MOTION TO APPROVE CASH
DEPOSIT IN LIEU OF SUPERSEDEAS BOND**

COMES NOW, GREG DUNCAN, MCCRAY GROUP AND FREWOOD
GROUP, and files the following request for relief:

1.

On May 14, 2017, this Court imposed sanctions upon Freewood Group, McCray Group and Greg Duncan, which included a provision for an attorney's fees sanction. Then on August 14, 2017, the Court imposed an attorney's fees sanction in the amount of \$33,425.25.

2.

Fed. Bankr. R. 8007 provides that this Court may stay an order pending appeal and may approve a supersedeas bond. *See* Rule 8007 (a) (1) (A) and (B).

3.

After approval of this motion and an order granting him permission to tender a deposit of a certified check, Greg Duncan will deposit into the registry of the Court a certified check in the amount of the attorney's fees sanction. Mr. Duncan currently has the check ready for deposit.¹

4.

Now that the attorney's fees sanction is secured, Duncan, McCray and Freewood request that the order of August 14, 2017 be stayed pending the outcome of the appeal and that the Court grant permission for the deposit of the certified check.

¹ Mr. Duncan attempted to deposit the check at the Bankruptcy Clerk's Office on Monday, November 13, 2017, but was told that it could not be deposited absent permission for this Court.

Respectfully submitted,

/s/ **John D. Nation**

John D. Nation
State Bar No. 14819700
4925 Greenville Ave., Suite 200
Dallas, Texas 75206
214-800-5160
214-800-5161 (facsimile)
nationlawfirm@gmail.com

CERTIFICATE OF CONFERENCE

Based on previous communications with Mr. Todd Murray, Counsel for Park Place, we believe that Park Place opposes the relief requested in this motion.

/s/ **John D. Nation**

John D. Nation

CERTIFICATE OF SERVICE

I hereby certify that I have served a true copy of this list to Mr. Steven C. Lockhart, Gardere Wynne Sewell, LLP, 2021 McKinney Avenue, Suite 1600, Dallas, Texas 75201, via the electronic filing system, on this 13th day of November 2017.

/s/ **John D. Nation**

John D. Nation